

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff,

- v. -

THE M/Y *AMADEA*, A MOTOR YACHT
BEARING INTERNATIONAL MARITIME
ORGANIZATION NO. 1012531, INCLUDING
ALL FIXTURES, FITTINGS, MANUALS,
STOCKS, STORES, INVENTORIES, AND
EACH LIFEBOAT, TENDER, AND OTHER
APPURTENANCE THERETO,

Defendant-*In-Rem*.

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23 Civ. 9304 (DEH)

**NOTICE OF MOTION TO STRIKE THE CLAIM, OR FOR SUMMARY JUDGMENT,
FOR LACK OF STANDING**

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of the United States of America’s Motion to Strike the Claim, or for Summary Judgment, for Lack of Standing, the Declaration of Jennifer Jude, the Local Rule 56.1 Statement, and all prior pleadings and proceedings herein, Plaintiff the United States of America, by its attorneys, Damian Williams, United States Attorney for the Southern District of New York, Margaret A. Moeser, Acting Chief of the Money Laundering and Asset Recovery Section, and Jennifer Kennedy Gellie, Executive Deputy Chief of the Counterintelligence and Export Control Section, hereby moves to strike the claim of claimants Eduard Khudainatov and Millemarin Investments Ltd.

(“Claimants”) pursuant to Rule G(8)(c)(i)(B) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.

Pursuant to Local Civil Rule 6.1(b), Claimants' opposition to Plaintiff's motion, if any, is due no later than May 31, 2024.

Dated: New York, New York
May 17, 2024

Respectfully Submitted,

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

By: /s/ Jennifer Jude
JENNIFER JUDE
MICHAEL LOCKARD
Assistant United States Attorneys

MARGARET A. MOESER
Acting Chief
Money Laundering and Asset Recovery
Section, Criminal Division
U.S. Department of Justice

By: /s/ Joshua L. Sohn
JOSHUA L. SOHN
Trial Attorney
Money Laundering and Asset Recovery
Section

JENNIFER KENNEDY GELLIE
Executive Deputy Chief
Counterintelligence and Export Control
Section, National Security Division
U.S. Department of Justice

By: /s/ Yifei Zheng
YIFEI ZHENG
Trial Attorney
Counterintelligence and Export Control
Section (CES)